

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	DATE FILED: _____
v.	:	CRIMINAL NO. _____
MICHAEL E. MANCUSO	:	VIOLATIONS: 18 U.S.C. § 844(e) (making threatening communications - 3 counts)

I N F O R M A T I O N

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. Defendant MICHAEL E. MANCUSO was employed as a horse carriage driver and was stationed in the area adjoining Independence National Park, which includes Independence Hall, in Philadelphia, Pennsylvania.
2. From on or about August 5, 2005, through on or about January 26, 2006, defendant MICHAEL E. MANCUSO made approximately 28 telephone calls to the Philadelphia Police Department's ("PPD") 911 line stating that there was a bomb at Independence Hall, when he knew that this information was false.
3. As a result of the bomb threat calls, the National Park Service and the PPD were required to take significant reactive measures, which included sending numerous emergency personnel to the scene and evacuating Independence Hall.

4. On or about August 5, 2005 at approximately 6:25 p.m., in Philadelphia, in the Eastern District of Pennsylvania, defendant

MICHAEL E. MANCUSO

used an instrument of interstate or foreign commerce, that is, a telephone located on the northwest corner of 6th and Chestnut Streets in Philadelphia, to willfully make a threat and maliciously convey false information knowing it to be false, concerning an attempt being made to kill, injure, and intimidate an individual, and unlawfully damage and destroy a building by means of an explosive, in that defendant MANCUSO called PPD's 911 line and reported that there was a bomb at Independence Hall.

In violation of Title 18, United States Code, Section 844(e).

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are realleged here.
2. On or about January 10, 2006, at approximately 2:40 p.m., in Philadelphia, in the Eastern District of Pennsylvania, defendant

MICHAEL E. MANCUSO

used an instrument of interstate or foreign commerce, that is, a telephone located on the northwest corner of 6th and Chestnut Streets in Philadelphia, to willfully make a threat and maliciously convey false information knowing it to be false, concerning an attempt being made to kill, injure, and intimidate an individual, and unlawfully damage and destroy a building by means of an explosive, in that defendant MANCUSO called PPD's 911 line and reported that there was a bomb at Independence Hall.

In violation of Title 18, United States Code, Section 844(e).

COUNT THREE

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 3 of Count One are realleged here.
2. On or about January 26, 2006, at approximately 4:20 p.m., in Philadelphia, in the Eastern District of Pennsylvania, defendant

MICHAEL E. MANCUSO

used an instrument of interstate or foreign commerce, that is, a telephone located on the northwest corner of 6th and Chestnut Streets in Philadelphia, to willfully make a threat and maliciously convey false information knowing it to be false, concerning an attempt being made to kill, injure, and intimidate an individual, and unlawfully damage and destroy a building by means of an explosive, in that defendant MANCUSO called PPD's 911 line and reported that there was a bomb at Independence Hall.

In violation of Title 18, United States Code, Section 844(e).

PATRICK L MEEHAN
United States Attorney